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FILED

LITE DEPALMA GREENBERG & RIVAS, LLC

Allyn Z. Lite (AL-6774)
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Newark, New Jersey 07102
(973) 623-3000

APR 17 2001

AT 8:30
WILLIAM T. WALSH
CLERK

RECEIVED

Proposed Liaison Counsel for Plaintiffs and the Class

WECHSLER HARWOOD HALEBIAN & FEFFER LLP

Robert I. Harwood
Joshua D. Glatter
488 Madison Avenue, 8th Floor
New York, NY 10022
(212) 935-7400

AT 8:30
WILLIAM T. WALSH
CLERK

Proposed Lead Counsel for Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MARVIN MYERS, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

Civil Action No. 01-CV-829 (KSH)

[Additional captions below]

**BRIDGEWATER PARTNERS' NOTICE OF MOTION AND MOTION FOR
CONSOLIDATION OF RELATED CASES, APPOINTMENT OF LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL PURSUANT TO THE
FEDERAL SECURITIES LAWS**

DOMINIC CASTALDO, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-916 (KSH)
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BRENDA GREENBLATT, on behalf
of herself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-917 (KSH)
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BRIDGEWATER PARTNERS, on behalf
of itself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-934 (KSH)
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TODD SIMON, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN, THOMAS H. KELLY,
and JOHN AND JANE DOES I THROUGH X,

Defendants.

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) Civil Action No. 01-CV-1134 (KSH)
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JOSHUA H. GRABAR, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-1155 (KSH)
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MARC RATZERDORFER, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-1303 (KSH)
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EUGENE OLSON, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-1350 (KSH)
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GLORIA A. PADGETT, on behalf
of herself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-1368 (KSH)
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GEORGE PINER, on behalf
of himself, and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION,
RICHARD J. KOGAN and THOMAS H. KELLY,

Defendants.

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) Civil Action No. 01-CV-1368 (KSH)
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PLEASE TAKE NOTICE that at 10:00 a.m., May 14, 2001, or on such date and time as will be set by the Court, plaintiff Bridgewater Partners ("Bridgewater"), which acquired shares of Schering-Plough Corp. ("Schering-Plough" or the "Company") between July 25, 2000 through February 15, 2001 (the "Class Period") will move this Court for an order granting its motion for consolidation of the above-captioned related cases, appointment of lead plaintiff, and approval of its selection of Lead Counsel for the Class.

The motion is brought pursuant to Rule 42 of the Federal Rules of Civil Procedure to consolidate the related actions, as well as Section 21D(a)(3) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3) for its appointment as lead plaintiff for the Class on the grounds that Bridgewater has timely filed the instant motion, and is the "most adequate plaintiff." In addition, Bridgewater seeks the Court's approval of its selection of the firm of Wechsler Harwood Halebian & Feffer LLP as Lead Counsel, and the firm of Lite DePalma Greenberg & Rivas, LLC as Liaison Counsel, pursuant to Section 21D(a)(3)(B)(v) of the Exchange Act, 15 U.S.C. § 78u-4(a)(3)(B)(v)).

The Motion is based on (1) the accompanying memorandum of law; (2) the Declaration of Robert I. Harwood, with exhibits; and (3) proposed orders granting the relief requested and (4) the pleadings, and such other written or oral argument as may be permitted by the Court.

Dated: April 17, 2001

LITE DEPALMA GREENBERG & RIVAS, LLC

By: 
Allyn Z. Lite (AL-6774)
Joseph J. DePalma (JD-7697)
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Proposed Liaison Counsel for Plaintiffs and the Class

**WECHSLER HARWOOD HALEBIAN
& FEFER LLP**

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Proposed Lead Counsel For Plaintiffs and the Class